Schena, Cristeen

From: Matt Fragala <MFragala@EHEinc.com>
Sent: Friday, February 14, 2014 12:14 PM
To: Tisa, Kimberly
Subject: RE: Estabrook Demolition

That works. I will give you a call next Wednesday at 2:00.

Matt

From: Tisa, Kimberly [mailto:Tisa.Kimberly@epa.gov]
Sent: Friday, February 14, 2014 12:12 PM
To: Matt Fragala
Subject: RE: Estabrook Demolition

Wednesday is good. How about in the afternoon, say after 2:00?

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
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From: Matt Fragala [mailto:MFragala@EHEinc.com]
Sent: Friday, February 14, 2014 11:07 AM
To: Tisa, Kimberly
Subject: RE: Estabrook Demolition

Sure, when are you available? I am in meeting all day today but am available Tuesday afternoon or Wednesday.

Matt

From: Tisa, Kimberly [mailto:Tisa.Kimberly@epa.gov]
Sent: Friday, February 14, 2014 11:08 AM
To: Matt Fragala
Subject: RE: Estabrook Demolition

Matt:

Before submitting a revision, can we discuss?

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From: Matt Fragala [mailto:MFragala@EHEinc.com]
Sent: Friday, February 14, 2014 9:17 AM
To: Tisa, Kimberly
Subject: RE: Estabrook Demolition

Hi Kim

Thanks for reviewing the plan. I will work on addressing your comments over the next few days and send you back a revised copy. There have been a few delays on the project so it is not going to be starting until mid-March.

Matt

From: Tisa, Kimberly [mailto:Tisa.Kimberly@epa.gov]
Sent: Thursday, February 13, 2014 5:36 PM
To: Matt Fragala
Cc: Tisa, Kimberly
Subject: Estabrook Demolition

Matt:

We recently discussed the issue related to waste classification of PCB-contaminated materials to be generated during demolition of the Estabrook School in Lexington, MA. Of particular issue was the waste classification "PCB bulk product waste < 50 ppm". As I originally indicated to you there is no such classification. Rather, the waste codes associated with waste likely would be PCB bulk product waste; PCB remediation waste; and excluded PCB products. You indicated that you would revise the plan and resend.

A revised plan dated February 4, 2014 was received. This plan was submitted in accordance with Attachment 1, Condition 1 of the December 2011 Risk-Based Disposal Approval for the Site.

I have reviewed and provide the following comments:

1. There is reference throughout this document to "PCB bulk product waste < 50 ppm". As previously indicated, this classification does not exist.

2. Table 3 contains reference to PCB bulk product waste < 50 ppm PCB. Again, no such classification.

3. Page 3. With respect to the brick, please note that per the 2012 PCB bulk product waste reinterpretation, the brick would have had to be classified as a PCB bulk product waste prior to removal of the caulk. Since the removal occurred prior to the 2012 Reinterpretation, it is unclear if the brick could still be classified as a PCB bulk product waste. Please confirm the presence of residual caulk on this substrate to support classification as a PCB bulk product waste. Otherwise, it may have to be managed as a PCB remediation waste. Regardless, the proposed disposal facility (RCRA hazardous waste landfill) could accept both waste streams.

4. With respect to classification of PCB bulk product waste as a MA-02 waste and a hazardous waste, EPA would encourage Lexington to discuss this matter with the MassDEP as other options may be available for management of this type of waste.

5. Table 5.4 identifies building substrates that will be removed/disposed of as a PCB waste. EPA has previous comments on the < 50 PCB bulk product waste classification. With that said, EPA notes that the brick > 4 inches from the caulk joint was not mentioned. How is the brick > 4 inches from the caulk joint to be managed?

6. With the exception of the brick referenced in item 5, above, please confirm that all other building materials are to be removed and disposed of in a permitted disposal facility (i.e., either TSCA-permitted landfill, RCRA hazardous waste landfill, or state-permitted non-hazardous waste landfill).

7. Page 29. There is reference to the "homogenous characteristics" of paint and caulk. This may be true for these types of products at the Site, but EPA's experiences at other sites suggests otherwise where PCB concentrations in paints and caulks throughout a facility can vary widely even through visually they may appear similar.

8. Table 6.5 and 6.6. Could you please confirm how the CMU adjacent to the caulk and the cove base was collected. If samples were collected and composited from multiple locations, it is not clear that the individual sample results are all < 50 ppm.

9. Page 40, Section 12.2.1. There appears to be a slight discrepancy in the disposal plan for brick/concrete. Previously, it was indicated that brick and concrete within 4 inches of the caulk would be managed in a RCRA-C hazardous waste landfill. Here is it indicated that all brick and concrete would o to a RCRA Title D Landfill unless the sample fails TCLP.

10. EPA is not in agreement with the air monitoring action level as described in Section 12.3, especially given the location of the demolition project. Please consider the following:

CONTAMINANT	AIR ACTION LEVEL	REQUIRED ACTION
articulates (PM_{10})	Any visible dust	Implement corrective measures to control dust
articulates (PM_{10})	>75 µg/m^3 (a)	Increase application of dust controls
articulates (PM_{10})	> 150 µg/m^3 (a)	Continue wetting of source area. Suspend activities until problem c
articulates (PM_{10})	> 100 µg/m^3 (b)	Continue wetting of source area. Suspend activities until problem c

(a) Based on 5-minute weighted average

(b) Based on 8-hour weighted average

I would be glad to discuss the above, should you have any questions.

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